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10 *Attorneys for Plaintiffs*

11 **UNITED STATES DISTRICT COURT**
12 **CENTRAL DISTRICT OF CALIFORNIA**

13 A.J.P. and A.M.P., minors by and
14 through their guardian ad litem Cynthia
15 Nunez, individually and as successor in
16 interest to Albert Perez, deceased; and
17 PATRICIA RUIZ, individually,

18 Plaintiffs,

19 v.

20 COUNTY OF SAN BERNARDINO;
21 DAVID MOORE, CORY MCCARTHY,
22 CHRISTINA OLIVAS, ANDREW
23 POLLICK, and DOES 5-10, inclusive,

24 Defendants.

Case No. 5:22-CV-01291 SSS (SHKx)
Hon. Judge Sunshine S. Sykes,
Hon. Mag. Shashi H. Kewalramani

**NOTICE OF SETTLEMENT OF
ENTIRE CASE AND REQUEST TO
VACATE ALL DATES**

*[Proposed] Order Filed Concurrently
Herewith*

1 **TO THIS HONORABLE COURT:**

2 IT IS HEREBY STIPULATED BY AND BETWEEN A.J.P. and A.M.P.,
3 minors by and through their guardian ad litem CYNTHIA NUNEZ, individually and
4 as successor in interest to ALBERT PEREZ, deceased; and PATRICIA RUIZ,
5 individually ("Plaintiffs") and COUNTY OF SAN BERNARDINO; CORY
6 MCCARTHY, ANDREW POLLOCK; DAVID MOORE, and CRISTINA OLIVAS
7 ("Defendants"), by and through their attorneys of record, hereby inform the Court of
8 their settlement of this entire matter, and respectfully request that the Court vacate all
9 dates in this matter as the parties finalize their settlement, and stipulate as follows:

10 WHEREAS, the parties have reached an agreement to settle the entire case.

11 WHEREAS, this case involves minor plaintiffs, A.J.P. and A.M.P., who will
12 need to file petitions for approval of the compromise of their claims with this Court.

13 WHEREAS, the parties request that all dates and deadlines be vacated,
14 including the trial date, based on the parties' settlement of the entire action.

15 WHEREAS, the parties further request that the Court maintain jurisdiction
16 over this action for ninety (90) days to allow time for the minor plaintiffs, through
17 their guardian ad litem, to select annuity proposals and file their petition, to allow
18 time for this Court to consider the minor's compromise petitions, and to allow time
19 for the parties to consummate the terms of the settlement, including payment of the
20 settlement funds.

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1 WHEREAS, based on the above, good cause exists for granting the parties'
2 stipulation.

3 IT IS SO STIPULATED.

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5 Respectfully submitted,

6 DATED: May 21, 2024

LAW OFFICES OF DALE K. GALIPO

8 By /s/ Dale K. Galipo
9 Dale K. Galipo
10 Shannon J. Leap¹
11 Attorneys for Plaintiffs

12 DATED: May 21, 2024

MANNING & KASS
ELLROD, RAMIREZ, TRESTER LLP

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16 By /s/ Kayleigh A. Andersen
17 Eugene P. Ramirez, Esq.
18 Lynn Carpenter, Esq.
19 Kayleigh A. Andersen, Esq.
20 Attorneys for Defendants, COUNTY OF
21 SAN BERNARDINO, et al.

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27 ¹ As the filer of this document, I attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

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